

FILED

OCT 27 2020

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JACOB MATHLEY

)
) No. 20 CR 585
)
) Violation: Title 18, United States Code,
) Section 2252A(a)(5)(B)

COUNT ONE

JUDGE ALONSO
MAGISTRATE JUDGE VALDEZ

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

On or about September 2, 2020, at Aurora, in the Northern District of Illinois,
Eastern Division,

JACOB MATHLEY,

defendant herein, knowingly possessed material, namely, an ASUS laptop notebook, model X540S, bearing serial number G9N0CX18X15038D, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, such image having been shipped and transported using any means and facility of interstate and foreign commerce; and such image having been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2252A as set forth in this Indictment, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18, United States Code, Section 2252A; any property constituting and traceable to gross profits and other proceeds obtained from such offense; and any property used and intended to be used to commit and to promote the commission of such offense, and any property traceable to such property, as provided by Title 18, United States Code, Section 2253(a).

2. The property to be forfeited includes, but is not limited to, an ASUS laptop notebook, model X540S, bearing serial number G9N0CX18X15038D.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY